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UNITED STATES DISTRICT COURT FOR THE
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR-08-222-WHA
)	
Plaintiff,)	STIPULATION TO EXCLUDE
)	TIME UNDER THE SPEEDY
v.)	TRIAL ACT
)	
LUKE D. BRUGNARA,)	
)	
Defendant.)	

This matter came on for a status hearing on August 19, 2008. The parties, through their counsel of record, hereby stipulate and agree that the period of time from August 19, 2008 to September 30, 2008 shall be excluded under the Speedy Trial Act pursuant to 18 U.S.C. §§ 3161(h)(8)(A), (B)(ii), and (B)(iv) due to the complexity of this case, to allow the defendant and his counsel reasonable time necessary for effective preparation of the defenses taking into account the exercise of due diligence, and for continuity of counsel.

Respectfully submitted,

JOSEPH P. RUSSONIELLO
United States Attorney

Dated: August 25, 2008

/s/Thomas M. Newman
THOMAS M. NEWMAN
Assistant United States Attorney
Tax Division

Dated: August 25, 2008

/s/Kenneth H. Wine
Kenneth H. Wine
Attorney for Defendant

ORDER

This Court agrees and finds that the ends of justice served by excluding time from August 19, 2008 to September 30, 2008, outweigh the best interests of the public and the defendant in a speedy trial, because of the complexity of this case and the defendant and his counsel are entitled to a reasonable time necessary for effective preparation of the defenses.

IT IS SO ORDERED.

Dated: _____

WILLIAM H. ALSUP
United States District Court Judge